

VCY America, Inc.

3434 West Kilbourn Avenue
Milwaukee, WI 53208

April 11, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St SW
Washington DC 20554

Re: MB Docket No. 04-233

Dear Ms. Dortch,

Please receive these comments in opposition to the FCC's Notice of Proposed Rulemaking contained in MB Docket No. 04-233. We contend that this proposal is unnecessary, over burdensome, and is counter productive.

As a non-commercial religious broadcaster, we are intently involved in serving the public. Our operations budget is largely provided by listener contributions. The very fact that our stations range in age from a few months old to over 40 years on the air, are evidence of the fact that we are serving the public and are broadcasting in their interest. Simply put, if we did not broadcast in the public interest, the support base to continue our operations would cease. This is further evidenced that our listeners are so excited and appreciative of the format that many will submit additional contributions toward the acquisition of new broadcast outlets so that the format may serve new communities and serve more people.

Being listener supported, the proposed rules would also present tremendous financial hardship on this non-profit organization. The very fact that we've been able to utilize current technology to deliver signals and communicate to listeners in multiple locations with minimum staff has enabled us to take radio to rural communities that would otherwise be un-served or underserved by our format which includes religious teaching, extensive children's programming (which most stations have discontinued) interactive and public affairs programming. Improved and reliable technology enables programming to continue on the air with remote control capabilities. Requiring staff presence around the clock at each broadcast facility would dramatically raise our operating costs and would place an extreme financial hardship on the licensee. Should the NPRM go forth, the licensee will have to re-evaluate its ability to continue 24/7 programming. If forced to cut back, this actually would have the opposite impact the Commission is seeking to make in serving the public.

This NPRM also presents great concerns in regard to free speech and being able to broadcast controversial issues and Biblical messages of faith. The proposal means that we could be forced to take programming advice from those individuals whose values and/or religious beliefs are in conflict with major doctrines of Christianity.

Those who are even hostile to our beliefs could demand representation. This strikes at the very core of our mission and statement of beliefs. This representation would likely have a stifling effect upon our broadcasting. We believe the broader issue is that this requirement would violate our First Amendment freedoms.

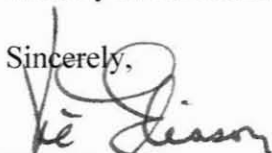
In regard to the establishment of minimum programming requirements for the processing of the license renewal applications, we believe that the licensee is capable of making such decisions without mandates being placed upon them. As stated previously, if this licensee fails to broadcast in the public interest our flow of support will be curtailed by the listeners. Further, to make a "one size fits all" decision which impacts all stations does not take into account the type of format the station (ie: music vs. news/talk) uses.

In conclusion we are pleased to serve the public by providing our unique format of faith based religious broadcasting to our listeners in multiple geographical areas. The vast letter response, contributions, and phone calls coming into the licensee indicate very strongly that we are serving the public. Our format is meeting the needs of many listeners and regularly we receive requests from numerous other geographical areas requesting that we seek a way to provide our radio service to their communities as well. Further, we are providing areas of service that many other licensees disregard. We seek to program to listeners of all ages, providing multiple hours of programming each week that young people enjoy as well as programming which serves young adults, middle-age adults and senior citizens. All of this indicates a very broad spectrum of those who listen and are being served.

These unique areas of broadcasting have enabled this licensee to have further impact in non-broadcast venues such as special outreaches to delinquent youth, a summer camping program for children, and a birthday club reaching many thousands of young people. Meeting with the public at licensee-sponsored events also regularly occurs. We believe leaving the public interest obligations up to the individual broadcaster enables us to have these unique opportunities that may otherwise be neglected by a cookie-cutter approach included in this NPRM. Other broadcasters reach out in the community in their own ways, which allows for great diversity in looking at broadcasting as a whole.

Thank you for considering our comments in your re-evaluation of MB Docket No. 04-233.

Sincerely,

A handwritten signature in dark ink, appearing to read "Vic Eliason", written over a horizontal line.

Vic Eliason
Vice President
VCY America, Inc.